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6 *Attorney for Plaintiffs*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

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10 TAYLOR SOMMER, individually; TAYLOR  
11 SOMMER, as the Administrator of the ESTATE  
12 OF REINER SHAWN SOMMER, deceased,

13 Plaintiffs,

14 vs.

15 CITY OF LAS VEGAS, NEVADA, a political  
16 subdivision of the State of Nevada; LAS  
17 VEGAS METROPOLITAN POLICE  
18 DEPARTMENT, a political subdivision of the  
State of Nevada; JOE LOMARDO, individually  
19 and as a policy maker and Sheriff of LAS  
VEGAS METROPOLITAN POLICE  
20 DEPARTMENT; SERGEANT GERALD  
BAGAPORO, individually and in his official  
21 capacity; SERGEANT JEFFREY BLUM,  
individually and in his official capacity;  
22 OFFICER ANDREW GARCIA, individually  
and in his official capacity; OFFICER JOSEPH  
23 ORTEGA, individually and in his official  
capacity; DOE LAS VEGAS METROPOLITAN  
24 POLICE DEPARTMENT SUPERVISORS I  
through X, inclusive; ROE LAS VEGAS  
25 METROPOLITAN POLICE DEPARTMENT  
26 OFFICERS XI through XX, inclusive,

27 Defendants.  
28

Case No.: 2:23-cv-01682-GMN-NJK

**STIPULATION TO EXTEND TIME TO  
RESPOND TO MOTION FOR SUMMARY  
JUDGMENT [ECF #32] (THIRD  
REQUEST)**

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COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*, “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT; JOE LOMBARDO; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM; OFFICER ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”) by and through their undersigned counsel of record, and hereby stipulate and agree as follows:

1. The Defendants hereto filed a Motion for Summary Judgment on January 10, 2025 [ECF #32]. Pursuant to a stipulation for a second extension granted on February 19, 2025 [ECF #39], a response to said Motion is presently due on February 28, 2025.
2. Plaintiff’s counsel has had a number of other work obligations which have greatly reduced the time available to respond to the subject motion, including numerous other briefs, motions and oppositions. Since the time of the second extension, Plaintiff’s counsel has also had several medical appointments. The Response is nearly completed but requires final review and editing before filing.
3. Based upon the foregoing, Plaintiffs’ counsel has requested and shall be granted an extension of time in which to respond to Defendants’ Motion for Summary Judgment until March 7, 2025. Plaintiffs intend to file the Response prior to said time but desire to avoid even the possibility of requiring any additional extensions.
4. The requested extension should not interfere with the parties’ ability to complete briefing in advance of the settlement conference that is scheduled to take place on March 24, 2025 [ECF #35].

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5. This Stipulation is made in good faith and not for purpose of delay.

DATED this 28<sup>th</sup> day of February, 2025.

ROGER P. CROTEAU & ASSOCIATES, LTD.	MARQUIS & AURBACH
<p><u>/s/ Timothy E. Rhoda</u></p> <p>ROGER P. CROTEAU, ESQ.                      Nevada Bar No. 4958                      TIMOTHY E. RHODA, ESQ.                      Nevada Bar No. 7878                      2810 West Charleston Blvd., #67                      Las Vegas, Nevada 89102                      702-254-7775  <a href="mailto:croteaulaw@croteaulaw.com">croteaulaw@croteaulaw.com</a>  <i>Attorney for Plaintiffs</i></p>	<p><u>/s/ Craig R. Anderson</u></p> <p>CRAIG R. ANDERSON, ESQ.                      Nevada Bar No. 6882                      10001 Park Run Drive                      Las Vegas, Nevada 89145                      702-382-0711  <a href="mailto:canderson@maclaw.com">canderson@maclaw.com</a>  <i>Attorney for Defendants</i></p>

IT IS SO ORDERED:

Dated this 28 day of February 2025.

  
 UNITED STATES DISTRICT JUDGE

ROGER P. CROTEAU & ASSOCIATES, LTD.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of February, 2025, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT [ECF #32]** **(THIRD REQUEST)** to the following parties:

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/s/ Timothy E. Rhoda

An employee or agent of ROGER P.  
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